



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400
NEW YORK, NY 10281-1022

February 14, 2022

By ECF

Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

MEMO ENDORSED

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,
12-CV-6421 (KMK)

Dear Judge Karas:

I write on behalf of the United States Securities and Exchange Commission ("Commission") to inform the Court that Defendant Edward Bronson ("Bronson") has failed to provide proof of compliance with the Court's Order to pay the \$1,100,000 installment payment due pursuant to his plan by February 13, 2022. DE 301.

As background, the Court's Order requires Bronson to pay the Commission \$1,100,000 by the 13th of each month and to file proof of payment and available funds on ECF or face arrest for his contempt. DE 301. The Order provides that "[i]f Bronson fails to pay and/or fails to file proof of payment on ECF by the due date of the payment along with proof of funds available to make the payment the U.S. Marshals Service for the Southern District of New York shall take Bronson into custody for his civil contempt." *Id.* After repeated instances of Bronson failing to pay timely, on January 27, 2022, the Court ordered Bronson incarcerated. DE 320. When Bronson paid and the Court ordered his release, the Court's Order stated that: "Mr. Bronson is advised that a late payment, by even a day, will result in his arrest and imprisonment." DE 324.

As Bronson has again failed to provide proof that he made a timely payment voluntarily, the Commission respectfully requests that Bronson be imprisoned until he pays the \$1.1 million payment.

Respectfully submitted,

Maureen Peyton King

The SEC is to provide an arrest warrant
for Mr. Bronson ASAP.

So Ordered.

2/14/22